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The Honorable Robyn F. Tarnofsky
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
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Application granted. The stay of discovery is continued through November 22, 2024. By that date, the parties shall submit a joint update on the status but not the substance of their settlement talks. The Clerk of Court is respectfully requested to terminate ECF 90.

Date: 11/04/2024
New York, NY

SO ORDERED


ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

RE: Zaziiz S. L. Dinkins v. Alejandro Mayorkas
1:23-cv-10660-RFT

Dear Judge Tarnofsky:

As Your Honor is aware, we represent Plaintiff Zaziiz S. L. Dinkins as *pro bono* counsel for the limited purpose of conducting a Settlement Conference in the above-referenced matter. We, along with counsel for Defendant Alejandro Mayorkas, United States Secretary of Homeland Security, submit this second update regarding the status of discovery pursuant to the Court's Case Management Plan (*see* ECF No. 87) and, respectfully, request a continued brief stay of discovery in this matter pending continued settlement discussions.

First, as detailed in the first status update, notwithstanding the appearance of the undersigned as *pro bono* counsel for Plaintiff, the parties have engaged in limited discovery. On August 25, 2024, Plaintiff served Defendant with her answers to Defendant's interrogatories. Plaintiff has advised Defendant that she is in the process of collecting additional responsive documents and information and will produce them as soon as possible. On November 1, 2024, Plaintiff exchanged additional documents with Defendant's counsel.

Second, on October 1, 2024, the parties appeared for a Pre-Settlement Conference Scheduling Call with Judge Ona T. Wang, and on November 20, 2024, the parties will be appearing before Judge Ona T. Wang for the Settlement Conference (*see* ECF No. 89). After continuing to confer, the Parties still believe that there is a realistic opportunity to resolve this matter at the November 20, 2024 Settlement Conference. Thus, they respectfully seek a continued stay of discovery pending completion of the Settlement Conference. The parties seek a continued stay of discovery to allow them to conserve their time and resources to focus on the submission of mediation statements and to prepare for the Settlement Conference. The parties are prepared to submit an update to the Court promptly upon the completion of the Settlement Conference to advise as to whether the matter has been resolved.

November 4, 2024

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We thank the Court for its attention to this matter and consideration of this request.

Sincerely,

/s/ Christie R. McGuinness
Christie R. McGuinness, Esq.

CC:

All Counsel Of Record Via ECF.